

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware  
corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR  
INTERNATIONAL, INC., a Delaware  
corporation, and FAIRCHILD  
SEMICONDUCTOR CORPORATION,  
a Delaware corporation,

Defendants.

C.A. No. 04-1371

**DECLARATION OF BAS DE BLANK IN SUPPORT OF DEFENDANTS'**  
**EXPEDITED MOTION TO AMEND THE SCHEDULE**

I, Bas de Blank, the undersigned, declare as follows:

1. I am an attorney with the firm of Orrick, Herrington & Sutcliffe LLP, counsel of record for Defendants Fairchild Semiconductor International, Inc. and Fairchild Semiconductor Corp. (collectively, "Fairchild"). I am admitted to the Bar of the State of California. I make this declaration in support of Defendants' Motion to Amend the Schedule. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of a letter from Bas de Blank to Gina Steele dated July 12, 2005.

3. The parties had agreed to begin Mr. Balakrishnan's deposition on September 28, 2005 and continue for at least two days. At 12:46 p.m. on September 26, 2005, Michael Headley left me a voicemail message stating that Mr. Balakrishnan was "on medication," "having trouble breathing" and would not be available for deposition as agreed.

4. Attached hereto as Exhibit B is a true and correct copy of an electronic message from Michael Headley to Bas de Blank dated October 3, 2005.

5. Attached hereto as Exhibit C is a true and correct copy of an electronic message from Michael Headley to Bas de Blank dated September 27, 2005.

6. Attached hereto as Exhibit D is a true and correct copy of an electronic message from Michael Headley to Bas de Blank dated October 4, 2005.

7. On or about October 12, 2005, I had a teleconference with Mr. Headley in which I agreed to reschedule Mr. Balakrishnan's deposition but cautioned that this may require an extension of the case schedule so that Fairchild's experts could receive the discovery they needed before their reports were due. To avoid having to extend the case schedule, I proposed that Mr. Balakrishnan's deposition begin on October 20, 2005. Power Integrations refused, indicating that Mr. Balakrishnan was unavailable prior to November 17, 2005.

8. On October 19, 2005, I met with Mr. Headley in person and we agreed to begin Mr. Balakrishnan's deposition on November 17, 2005.

9. Attached hereto as Exhibit E is a true and correct copy of a letter from Bas de Blank to Michael Headley dated October 19, 2005.

10. Attached hereto as Exhibit F is a true and correct copy of a letter from Michael Headley to Bas de Blank dated October 21, 2005.

11. Attached hereto as Exhibit G is a true and correct copy of a letter from Bas de Blank to Michael Headley dated October 24, 2005.

12. At or about 6:00 p.m. on October 25, 2005 I met and conferred with Michael Headley by telephone. Mr. Headley rejected any compromise that would permit Fairchild to depose Mr. Balakrishnan prior to the exchange of expert reports. Thus, I informed Mr. Headley that Fairchild would seek the assistance of the Court. I requested that he agree to expedited briefing so that the Court could consider the issue prior to the October 31, 2005 exchange of expert reports. Mr. Headley refused this request. Mr. Headley also indicated that no attorney representing Power Integrations would be available for a hearing on the issue prior to October

31, 2005. Thus, I requested that Power Integrations agree to extend the date of the expert reports so that the Court could have a hearing on the issue should it choose. Mr. Headley refused.

I declare the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Executed on October 26, 2005 in Menlo Park, California.

  
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Bas de Blank  
ORRICK, HERRINGTON & SUTCLIFFE LLP